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REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims 1-18 are pending in the application. Claims 1 - 18 have been rejected. Claims 1, 8 and 9 have been voluntarily amended, for clarification only. The amendments do not narrow the scope of the claims, nor are they being made for reasons of patentability. Applicants respectfully assert that the amendments to the claims add no new matter.

CLAIM REJECTIONS

35 U.S.C. § 102 Rejections

In the Office Action, the Examiner rejected claims 1, 4-18 under 35 U.S.C. § 102(a), as being anticipated by Fernandez et al. (U.S. Patent No. 6,697,103).

Applicants respectfully traverse this rejection in view of the remarks that follow.

As is well established, in order to successfully assert a *prima facie* case of anticipation, the Examiner must provide a single prior art document that includes every element and limitation of the claim or claims being rejected.

Independent claims 1, 8 and 9 recite "two or more processing units, each coupled to a respective video sensor or an audio sensor to receive video or audio data from said sensor" and further "said control unit able to instruct said application bank to install at least one of said applications into at least one of said processing units".

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Independent claims 10 and 18 recite "installing one or more content-analysis applications from an application bank into one or more video or audio processing units" and further "video or audio sensors each coupled to a respective video or audio processing unit".

Fernandez at al. does not teach, either expressly or inherently, all the elements of independent claims 1, 8, 9, 10 and 18. In particular, Fernandez at al. does not disclose at least "two or more processing units, each coupled to a respective video sensor or an audio sensor" as recited in claims 1, 8 and 9 or "video or audio sensors each coupled to a respective video or audio processing unit", as recited in claims 10 and 18. Moreover, Fernandez at al. does not disclose "said control unit able to instruct said application bank to install at least one of said applications into at least one of said processing units", said control unit able to instruct said application bank to install at least one of said applications into at least one of said processing units" as recited in claims 1, 8 and 9 or "installing one or more content-analysis applications from an application bank into one or more video or audio processing units", as recited in claims 10 and 18.

In the office action, the Examiner contends that Fernandez at al. discloses "a control unit coupled to said processing units and to said application bank, said control unit able to instruct said application bank to install at least one of said applications into at least one of said processing units" by referring to column 8, lines 35-38 of Fernandez, which recites "an innovation instruction code and any related firmware or circuitry/equipment for analyzing and/or processing data".

Applicants disagree. Fernandez discloses integrated imaging and GPS network that monitors remote object movement (see Abstract). In particular, the system implementation integrates singlechip digital imaging camera and GPS receivers through generally accessible server processors using Internet network and a software browser (see column 1, lines 36-39). As can be seen from Fig. 1, detectors 3, which may be video capture devices, are coupled via network 8 to a single controller 6, which includes a processing module 48. The controller further includes software 66 with movement tracking module 163 and visual module 168. The software modules are not dynamically installable to various processing unit.

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Accordingly, applicants respectfully submit that claims 1, 8, 9, 10 and 18 are allowable and request that the rejection to these claims be withdrawn.

Claims 2, 4- 7 and 11 - 17 are dependent, directly or indirectly, from one of claims 1 and 10, and include all the limitations of the parent claim. Therefore, the patentability of claims 2, 4- 7 and 11 - 17 follows directly from the patentability of one of claims 1 and 10. Therefore, applicant respectfully asserts that claims 2, 4- 7 and 11 - 17 are likewise allowable and requests that the rejection of claims 2, 4- 7 and 11 - 17 be withdrawn.

35 U.S.C. § 103 Rejections

In the Office Action, the Examiner rejected claim 3 under 35 U.S.C. § 103(a), as being unpatentable over Fernandez et al (US Patent No. 6,697,103) in view of Monroe (US Patent No. 6,246,320).

An obviousness rejection requires a teaching or a suggestion by the relied upon art of all the elements of a claim (MPMP 2142).

Fernandez et al. (US Patent No. 6,697,103) has been discussed above with respect to the 35 U.S.C. 102 rejection of claim 1 and this discussion is applicable here as well. Monroe cannot cure the defects of Fernandez et al. Therefore, Applicant asserts that the combination of Fernandez et al and Monroe does not teach or suggest claim 1. Claim 3 is dependent from claim 1 and includes all the limitations of claim 1. Therefore, the patentability of claim 3 follows directly from the patentability of claim 1. Therefore, applicant respectfully requests that the rejection of claim 3 be withdrawn.

CONCLUSIONS

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

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Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

Respectfully submitted,


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